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Clark County School District,
Edward Goldman, James Ketsaa and
Christopher Klemp*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

DANIEL M. BURGESS, an individual;
ANTHONY RUSSO, an individual,

Plaintiffs,

vs.

CLARK COUNTY SCHOOL DISTRICT, a
political subdivision; EDWARD GOLDMAN,
an individual; JAMES KETSAA, an
individual; CHRISTOPHER KLEMP, an
individual,

Defendants.

Case No. 2:17-cv-00805-GMN-VCF

**STIPULATION FOR EXTENSION OF
TIME TO FILE DISCOVERY
PLAN/SCHEDULING ORDER**

(Second Request)

It is hereby **STIPULATED AND AGREED** between Plaintiff Daniel M. Burgess (“Burgess”) and Defendants, by and through their undersigned counsel, that the parties will have additional time to submit their proposed discovery plan up to and including **August 30, 2017**. This extension is requested as the Early Neutral Evaluation Session held on July 25, 2017 resulted in meaningful settlement discussions, and the parties wish to avoid incurring additional costs and fees while they actively pursue settlement. The proposed discovery plan/scheduling order is currently due August 9, 2017. This is the second request for an extension of time to file the proposed discovery plan/scheduling order.

1 The above stipulated extensions do not affect the deadlines relating to plaintiff, Anthony
2 Russo. Plaintiff Russo and Defendants will proceed in the ordinary course as to all scheduled
3 deadlines.

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5 DATED this 28th day of July, 2017.

6 GREENBERG TRAURIG, LLP

7
8 /s/ Kara B. Hendricks

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15 *Counsel for Defendants*

DATED this 28th day of July, 2017.

MAIER GUTIERREZ & ASSOCIATES

/s/ Jason R. Maier

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Counsel for Plaintiff Daniel M. Burgess

16 **IT IS SO ORDERED.**

17 

18 UNITED STATES MAGISTRATE JUDGE

19 Dated: July 31, 2017